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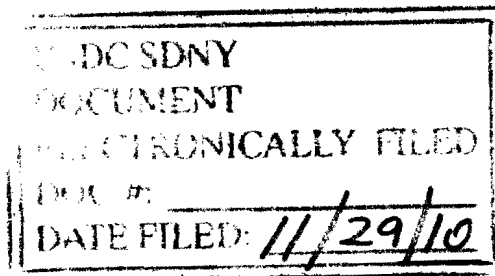
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November 11, 2010

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The Honorable Richard J. Holwell
United States District Court Judge
United States District Court, Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

**Re: *Edelman Arts, Inc. v. Art International (UK), Ltd.*
*No. 2006 Civ. 00410 (RJH)***

Dear Judge Holwell:

This firm is counsel for Art International (UK), Ltd. ("Art International"), the defendant in the above-captioned action. We are compelled to respond to the letter submitted by plaintiff, Edelman Art's ("Edelman"), counsel yesterday afternoon objecting to our request to reschedule the trial that was only just adjourned as a result of Your Honor's injury.

While any adjournment of a trial both sides have prepared for is unfortunate and frustrating, plaintiff's counsel's four page effort to portray Art International as intentionally delaying the resolution of this action is inaccurate and misleading. Edelman strings together a number of examples of Art International's intentional delay, all of which ring hollow when examined in context. For example, in suggesting that Art International's first summary judgment motion constituted a waste of time and resources, Edelman's counsel notably omits that plaintiff cross-moved for summary judgment. Edelman also cites to the entry of a protective order, but fails to mention that it entered such order by consent and without objection three years ago. Edelman cites to discovery extensions, but does not mention that such extensions were requested jointly by the parties. Edelman also surprisingly points to the delay in decision on Art International's second summary judgment motion as evidence of intentional delay. Finally, Edelman references the parties joint, but failed effort at mediation as further damning evidence of intentional delay.

Most importantly, Edelman does not mention that Art International was prepared to try this case in July. The July trial date was adjourned solely because of Edelman's failure to comply



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with Your Honor's Individual Rules. Certainly, that delay cannot be blamed on Art International. Edelman's portrayal of Art International now seeking a four month delay is also inaccurate, as Art International was prepared to proceed on January 24, 2011, but the Court's calendar could not accommodate that schedule. Art International then requested the first available dates its witnesses were available after the Court's calendar opened up -- either the week of March 14 or March 21, 2011.

At the Court's request, Art International attempted to work with Edelman to submit mutually convenient dates to reschedule the trial. This effort was rejected and instead met with the letter filed yesterday with the Court, impugning Art International's good faith, and demanding that the trial be set to conclude five days before the Christmas holiday. We respectfully submit that given the circumstances and the absence of any prejudice to Edelman, the trial be rescheduled to the week of March 14 or March 21, 2011, or the next immediate mutually convenient time for the parties and Court.

Thank you for your consideration and attention to this matter.

Respectfully yours,

SEYFARTH SHAW LLP

A handwritten signature in black ink, appearing to read "Alexander M. Jeffrey, Jr.", written over the firm name.

Alexander M. Jeffrey, Jr.

AMJ/gsw

cc: Charles A. Stewart III, Esq. -- via email
Katherine E. Perrelli, Esq. -- via email

*Because of scheduling constraints,
the trial will begin on March 14, 2011
at 10:00 a.m.*

SO ORDERED

A handwritten signature in black ink, appearing to read "Richard J. Holwell", written over the printed name.

RICHARD J. HOLWELL
UNITED STATES DISTRICT JUDGE

11/29/10